



**CONNOLLY BOVE LODGE & HUTZ LLP**

ATTORNEYS AT LAW

WILMINGTON, DE

The Nemours Building  
1007 North Orange St.  
P.O. Box 2207  
Wilmington, DE 19899  
TEL: (302) 658 9141  
FAX: (302) 658 5614  
WEB: www.cblh.com

Francis DiGiovanni  
Partner

TEL (302) 888-6316  
FAX (302) 658-5614  
EMAIL fdigiovanni@cblh.com  
REPLY TO Wilmington Office

January 31, 2007

**BY ELECTRONIC FILING**

The Honorable Gregory M. Sleet  
United States District Court  
for the District of Delaware  
844 N. King Street  
Wilmington, Delaware 19801

Re: *Dyson Tech. Ltd. et al. v. Maytag Corp.*, Civ. No. 05-434-GMS

Dear Judge Sleet:

In anticipation of the discovery teleconference scheduled for February 2, 2007, at 10:00 a.m. EST, the parties jointly submit the below items to be presented to the Court:

A. Defendant/Counterclaimant's Issues:

1. Discoverability of work-product and attorney-client information on the subject matter of the case that has been provided to or considered by Dyson's experts (specifically (a) Dyson's nine (9) specially-retained experts, and (b) Dyson's expert James Widdowson, who is an employee of Dyson Limited, an indirect parent of plaintiff Dyson Inc.).
2. Dyson's actions in opposing Maytag's efforts, pursuant to the Letters of Request granted by the Court (D.I. 142, 165, 179), to obtain third-party discovery in the United Kingdom.
3. Production of documents by Dyson relating to Dyson's in-home tests conducted outside the United States.
4. Dyson's designation of the expert report of Stephen Harrison as "Highly Confidential" and Dyson's refusal to allow Steve Kegg (Maytag employee) to review it. A memo prepared by Mr. Kegg is discussed in the Harrison report.

B. Plaintiff/Counterclaim Defendant's Issues:

1. How the outcome of issue A.1 applies to persons providing expert testimony for Maytag.
2. Production of prior testimony by persons providing expert testimony for Maytag.
3. Production of testing documents and customer complaint and repair information by Maytag.

Respectfully submitted,



Francis DiGiovanni

- cc: Clerk of the Court (by electronic filing)  
C. Barr Flinn, Esq.  
John Shaw, Esq.  
Kimball R. Anderson, Esq.  
Stephen P. Durchslag, Esq.  
Anthony DiSarro, Esq.  
Ronald Y. Rothstein, Esq.  
Ray L. Weber, Esq.  
Keith McKenna, Esq.  
Richard C. Pepperman II, Esq.  
Steven F. Reich, Esq.

518873\_1